

# Transit Services Title VI Program Update 2020

## City Council Work Session

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# Background

- As a recipient of federal grant funding, MMT is responsible for the effective execution of nondiscrimination laws and regulations:
  - Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs receiving federal financial assistance.
  - Federal Transit Administration (FTA) Circular 4702.1B and the U.S. Department of Justice (DOJ) guides MMT's efforts to uphold the basic civil rights of all people in the Colorado Springs Urbanized Area (UZA).

# Title VI Requirements - General

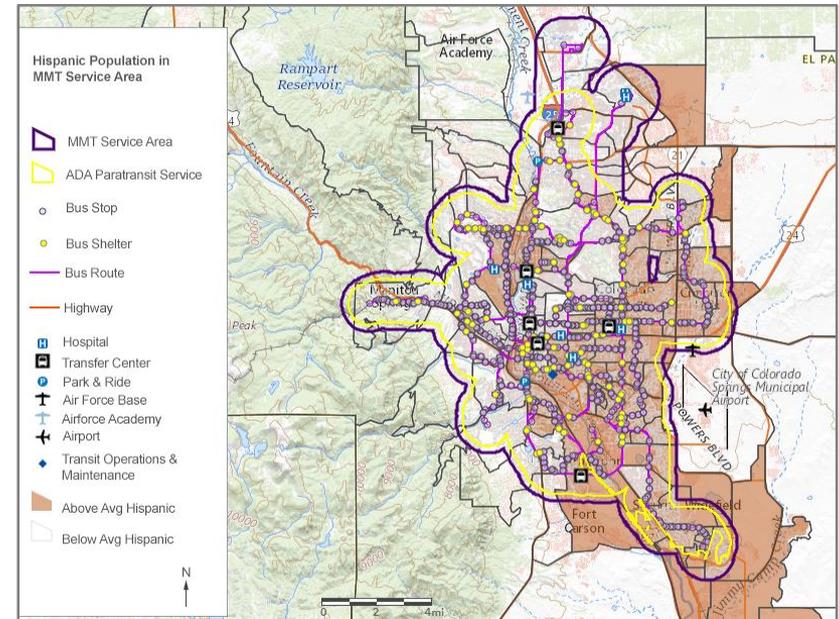
- MMT must submit a Title VI Program update to the FTA Regional Civil Rights Officer every three years which includes at a minimum:
  - Title VI notice to the public;
  - Title VI discrimination complaint form and procedures;
  - Transportation-related Title VI investigations, complaints, or lawsuits filed with the agency in previous three years;
  - Language Assistance Plan for limited English proficient persons based upon a four-factor analysis;
  - Public Participation Plan including outreach plans to engage minority and limited English proficient persons;
  - Racial makeup of any transit-related non-elected planning or advisory board;
  - Efforts used to ensure Title VI compliance from any subrecipients including assistance provided; and
  - Any Title VI equity analyses performed in relation to any facilities constructed since the last Program submittal.

## Title VI Requirements - Transit

- MMT provides fixed-route transit service which meets the threshold of serving an urbanized population of over 200,000 people and has 50 or more transit vehicles in peak service. Therefore, MMT must also provide:
  - System-wide service standards and policies to ensure the design and operation of service does not result in discrimination on the bases of race, color, or national origin;
  - Demographic analysis and maps of the transit service area;
  - Customer demographics and travel patterns, collected from passenger surveys;
  - Results of service standards and policies monitoring; and
  - Public engagement process for setting the “major service change policy” and disparate impact policy.

# 2020 Program Update Highlights

- Title VI program updates for 2020-2023 include:
  - Updated demographic data including maps of LEP, minority, and low-income populations in the MMT service area;
  - Updated four-factor analysis and LAP for Spanish speakers who are limited English proficient;
  - Updated customer demographics and travel pattern collected from the 2020 On-Board Survey;
  - Results of 2020 service standards and policies monitoring; and
  - Review and inclusion of equity analyses performed under the "major service change" policy.



# 2020 Program Update Results

- No disparate impact or disproportionate burden was found in the “major service change” equity analyses.
- No disparate impact or disproportionate burden was found in the service standard and policy monitoring:

Standard or Policy	Minority Results	Low-Income Results
Vehicle Load	No Disparate Impacts	No Disproportionate Burdens
Vehicle Headway	No Disparate Impacts	No Disproportionate Burdens
On-Time Performance	No Disparate Impacts	No Disproportionate Burdens
Service Availability	Minority Results	Low-Income Results
System Coverage	No Disparate Impacts	No Disproportionate Burdens
Stop Spacing	No Disparate Impacts	No Disproportionate Burdens
Transit Amenities	Minority Results	Low-Income Results
Shelters	No Disparate Impacts	No Disproportionate Burdens
Benches	No Disparate Impacts	No Disproportionate Burdens
Vehicle Assignment	No Disparate Impacts	No Disproportionate Burdens

# Questions?



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